

Appl. No. 09/976,212

### REMARKS/ARGUMENTS

In the Office Action, claim 46 was rejected under 35 U.S.C. 112, second paragraph, as being indefinite as to how traffic can be received via the first bus interface in the egress mode. The Examiner suggests that traffic should be received via the second bus interface.

This rejection is not entirely understood. According to the claim, means are operable in either an ingress mode or an egress mode. In the ingress mode, traffic is output to a switch fabric via the second bus interface, and in the egress mode, traffic is received from a switch fabric via the first bus interface. Thus, traffic is output via the second bus interface and received via the first bus interface. It is unclear from the Office Action why this would be regarded as indefinite. Applicant submits that this claim particularly points out and distinctly claims the subject matter of an aspect of the invention. Reconsideration and withdrawal of the rejection under 35 U.S.C. 112, second paragraph, are respectfully requested.

The Office Action also rejected claims 46 to 53 under 35 U.S.C. 102(e) as being anticipated by United States patent 6,751,224 to Parruck. As discussed in further detail below, however, Applicant respectfully submits that an essential element of an anticipation rejection is missing. The rejected claims include at least one feature that has not been explicitly disclosed in the referenced portions of the Parruck patent.

Considering first the rejected independent claim 46, page 3 of the Office Action refers to Figure 4 and column 8 lines 13 to 64 as allegedly disclosing the claimed subject matter. It is noted, however, that the subject matter allegedly disclosed in the cited reference and discussed on page 3 of the Office Action is not consistent with the subject matter recited in claim 46. In particular, the Office Action states that the cell delineation circuit 408 and the packet delineation circuit 410 are operable in a receive mode wherein traffic is output from the device 304 via the receive Utopia & POS-PHY interface 416, and also operable in a transmit mode wherein traffic is received onto the device 304 via the same receive Utopia & POS-PHY interface 416. Applicant respectfully submits that this is neither disclosed in the cited reference nor recited in the rejected claim 46.

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Regarding disclosure of the subject matter identified on page 3 of the Office Action, it is noted that the circuits 408, 410 in Figure 4 of the cited reference do not receive traffic from the receive Utopia & POS-PHY interface 416.

In addition, in the ingress and egress modes recited in claim 46, traffic is output from the integrated circuit and received onto the integrated circuit, respectively, via different interfaces.

This aspect of the anticipation rejection is also not entirely clear from the Office Action, in that the first subparagraph under Item 4 on page 3 of the Office Action refers to column 8 lines 46 to 64 of the Parruck patent as allegedly disclosing receipt of traffic onto the device 304 via "the second bus interface", which has been mapped to the receive Utopia and POS-PHY interface 416 by the Examiner earlier in that paragraph. This referenced portion of the Parruck patent, however, describes traffic being received by another interface, the transmit Utopia & POS-PHY interface 450. Traffic received on the transmit Utopia & POS-PHY interface 450 is received by the cell assembler 456 or the packet assembler 458, and not by the cell delineation circuit 408 or the packet delineation circuit 410. Clearly, different components 408/410 and 456/458 are involved in the receive and transmit operations in the Parruck patent. Accordingly, Figure 4 and the cited portions of the Parruck patent do not disclose means operable in an ingress mode wherein both cell-protocol traffic and packet-protocol traffic are output via a second bus interface or an egress mode wherein both cell-protocol traffic and packet-protocol traffic are received via a first bus interface.

Although Applicant believes that claim 46 as previously presented is not anticipated by the cited reference, this claim has been amended to further clarify the ingress and egress modes. According to claim 46 as currently amended, the means for receiving both cell-protocol traffic and packet-protocol traffic from the first bus interface, for buffering both the cell-protocol traffic and the packet-protocol traffic in a payload memory, and for outputting both cell-protocol traffic and packet-protocol traffic from the payload memory via the second bus interface are operable in either an ingress mode or an egress mode. In the ingress mode, both the cell-protocol traffic and the packet-protocol traffic are output from the integrated circuit to a switch fabric via the second

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bus interface, and in the egress mode both the cell-protocol traffic and the packet-protocol traffic are received onto the integrated circuit from a switch fabric via the first bus interface.

The referenced portions of the Parruck patent do not explicitly disclose in Figure 4 or the corresponding description that the components of the device 304 are operable in either an ingress mode or an egress mode as recited in claim 46. Although the device 304 may support receive and transmit operations, there is no disclosure that the device 304 is operable in either an egress mode or an ingress mode.

Claims 47 to 50 depend from independent claim 46 and thus also include features that have not been disclosed in the cited reference.

Turning now to independent claim 51, this claim recites a method in which a multi-service segmentation and reassembly (MS-SAR) integrated device is coupled to a switch fabric. The MS-SAR is configurable to operate in an ingress mode wherein it outputs switch cells, and in an egress mode wherein it receives switch cells. The claimed method further includes a step of configuring the MS-SAR to operate in one of the ingress mode and the egress mode.

Although Figure 4 of the cited reference shows receive components and transmit components, the sections of the cited reference identified in the discussion of claim 51 in the last paragraph on page 4 of the Office Action do not disclose configuring the device 304 to operate in one of a receive mode and a transmit mode. Whereas the device 304 may be capable of performing receive and transmit operations as described at lines 13 to 30 and 46 to 64 of column 8, these portions of the cited reference, and similarly col. 7 lines 11-19 noted at the end of page 4 of the Office Action, do not disclose that the device 304 can be configured to operate in one of two modes. Therefore, at least the step of configuring the MS-SAR to operate in one of the ingress mode and the egress mode, as recited in claim 51, is not disclosed in the particular portions of the Parruck patent identified in the Office Action.

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Applicant thus respectfully submits that independent claim 51, as well as claims 52 to 53 which depend therefrom, are not anticipated by the cited reference.

In summary, the rejection of claims 46 to 53 under 35 U.S.C. 102(e) is lacking an essential element, in that the identified portions of the cited reference do not disclose all of the limitations of the rejected claims. Reconsideration and withdrawal of this rejection are respectfully requested.

As noted on page 5 of the Office Action, claims 4, 10 to 16, and 45 have been allowed. As discussed in detail above, Applicant believes that the remaining claims 46 to 53 are also allowable.

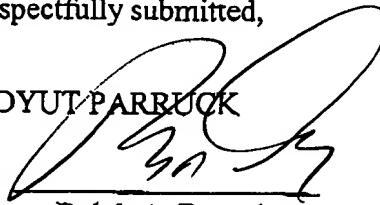
As will be apparent from the preceding Listing of Claims, Applicant has taken this opportunity to correct minor errors in allowed claim 10. In particular, "the" has been inserted before "means for generating", and "checking" has been inserted after "means for checking" at the end of the claim, as in original claim 10.

In view of the foregoing, it is respectfully submitted that the application is now in condition for allowance, and early action to this effect is earnestly solicited.

Respectfully submitted,

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1/20/2006

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